

## **EXHIBIT C**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORKJUDGE KOELTL  
ORIGINAL

UNITED STATES OF AMERICA

-v.-

ROYCE CORLEY,  
a/k/a "Ron Iron",

UNITED STATES OF AMERICA	DEFENDANT
-v.-	DATE FILED:
ROYCE CORLEY, a/k/a "Ron Iron",	DOC#:
	12 Cr.
ELECTRONICALLY FILED	
DOCUMENT	
USDC SDNY	

Defendant.

13 CRIM 048

COUNT ONE

The Grand Jury charges:

1. From at least in or about August 2011 up to and including in or about January 2012, in the Southern District of New York and elsewhere, ROYCE CORLEY, a/k/a "Ron Iron," the defendant, knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, and did benefit, financially and by receiving a thing of value, from participation in a venture which has engaged in such act, knowing and in reckless disregard of the fact, that means of force, threats of force, fraud, and coercion, and a combination of such means, would be used to cause the person to engage in a commercial sex act, and that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, to wit, CORLEY recruited, enticed, transported, provided, obtained and maintained a person who was less than 18-years old ("Victim-1"), causing images of Victim-1 to be transmitted over the internet for the purposes of engaging in commercial sex

acts, and compelling Victim-1 to engage in commercial sex acts that benefitted CORLEY financially.

(Title 18, United States Code, Sections 1591(a) & (b) (2).

COUNT TWO

The Grand Jury charges:

2. From at least in or about August 2011 up to and including in or about January 2012, in the Southern District of New York and elsewhere, ROYCE CORLEY, a/k/a "Ron Iron," the defendant, knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, and did benefit, financially and by receiving a thing of value, from participation in a venture which has engaged in such act, knowing and in reckless disregard of the fact, that means of force, threats of force, fraud, and coercion, and a combination of such means, would be used to cause the person to engage in a commercial sex act, and that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, to wit, CORLEY recruited, enticed, transported, provided, obtained and maintained a person who was less than 18-years old ("Victim-2"), causing images of Victim-2 to be transmitted over the internet for the purposes of engaging in commercial sex acts, and compelling Victim-2 to engage in commercial sex acts that benefitted CORLEY financially.

(Title 18, United States Code, Sections 1591(a) & (b) (2).

FORFEITURE ALLEGATION

3. As a result of committing the sex trafficking offense as alleged in Counts One and Two of this Indictment, ROYCE CORLEY, a/k/a "Ron Iron," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594: (1) any property, real and personal, used or intended to be used to commit or to facilitate the commission of the offense; and (2) any property, real and personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offense.

Substitute Asset Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

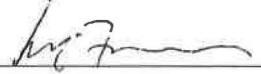
(c) has been placed beyond the jurisdiction of the Court;

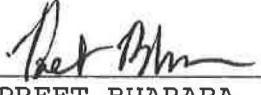
(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 1594; Title 21, United States Codes, Section 853; and Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

ROYCE CORLEY,  
a/k/a "Ron Iron"

Defendant.

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INDICTMENT

12 Cr. \_\_\_\_

(18 U.S.C. §§ 1591(a) and (b)(2).)

PREET BHARARA  
United States Attorney.

by F  
1/22/13 - Filed indictment.  
AC It was issued.  
Case assigned to Judge Koeltl.  
Judge Francis  
U.S.M.J.